## EPSTEIN SACKS PLLC

ATTORNEYS AT LAW

100 LAFAYETTE STREET - SUITE 502

NEW YORK, N.Y. 10013

(212) 684-1230

Fax (212) 571-5507

BENNETT M. EPSTEIN: (917) 653-7116 SARAH M. SACKS: (917) 566-6196

March 18, 2025

Hon. Colleen McMahon United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Filed on ECF

<u>United States v. Emmanuel Torres</u> 24 Cr. 474

Dear Judge McMahon:

We represent Emmanuel Torres pursuant to the Criminal Justice Act. He is out on bail and his travel is currently restricted to the Eastern and Southern Districts of New York. We write to respectfully request that his bail conditions be modified so that he can visit his brother in Meridien, Connecticut. Emmanuel hopes to travel there this Thursday (when he is off from work) and anticipates wanting to spend as much time with him as possible on his days off before he surrenders in May. For this reason, we are asking that his travel restrictions be amended to include the District of Connecticut. We have reached out to both pretrial services and the Government to discuss this modification, and neither has any objection.

Respectfully submitted,

Sarah M. Sacks